

December 1, 2024

BY ECF

Hon. Paul G. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

United States v. Gerson Morales-Plumei, 23 Cr. 582 (PAE)

Dear Judge Engelmayer:

My firm represents Mr. Morales-Plumei in the above-captioned violation of supervised release proceedings. Mr. Morales-Plumei's sentencing in this matter is currently scheduled for December 11, 2024, and his sentencing submission is currently due on December 4.

I respectfully write to request that the deadline for Mr. Morales-Plumei's submission be extended from December 4 to December 18, and that his sentencing date be adjourned from December 11, 2024 to the week of January 2, 2025 (or as soon as practicable for the Court thereafter). The reason for my request is that before completing and filing my sentencing submission on behalf of Mr. Morales-Plumei, I would like to ask a professional Spanish interpreter to transcribe the Government's sentencing submission, which was filed on the evening of Wednesday, November 26, into Spanish so that Mr. Morales-Plumei can read it and comment on any of the factual representations and arguments set forth in the Government's submission. In addition, I will need to have a professional interpreter transcribe my own draft sentencing submission into Spanish for Mr. Morales-Plumei to read and comment on before I file. I believe that the time required for the completion of these transcriptions, together with the time required for Mr. Morales-Plumei to review the transcribed materials at the MDC, counsel in favor of a two-week adjournment of the submission deadline.

MAX
NICHOLAS LLC

I have conferred with the Government about these requests, and the Government consents to them. I should have foreseen earlier the time that would be required for these tasks – I apologize for my lack of foresight when the parties initially discussed scheduling with the Court, and I thank the Court for its consideration of these requests.

Respectfully submitted,

/s/ Max Nicholas

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GRANTED. The sentencing is adjourned to January 7, 2025, until 11:00 a.m. The Clerk of Court is requested to terminate the motion at Dkt. 20.

SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge

Dated: December 4, 2024
New York, New York